

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

WASHINGTON TOXICS COALITION, et  
al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
INTERIOR, et al.,

Defendants.

Case No. 04-cv-1998

**STIPULATED MOTION TO  
EXTEND NOTICE DATE AND  
BRIEFING SCHEDULE ON  
PLAINTIFFS' MOTION TO  
COMPEL COMPLETION OF  
THE ADMINISTRATIVE  
RECORD**

NOTE ON MOTION CALENDAR:  
April 7, 2005

Plaintiffs and Federal Defendants hereby jointly move to extend the notice date on Plaintiffs' Motion to Compel Completion of the Administrative Record by three weeks, from April 22, 2005 to May 13, 2005, and to extend the briefing schedule on that motion as set forth below. In further support of this motion, Plaintiffs and Federal Defendants state as follows:

1. Plaintiffs filed their Motion to Compel Completion of the Administrative Record on April 1, 2004. That motion is currently noted for April 22, 2005. According to Local Rule 7(d)(3), Federal Defendants' opposition is due on April 18, 2005, and Plaintiffs' reply is due on April 21, 2005.

2. Counsel for Federal Defendants states that, as a result of conflicting obligations in other matters, including oral argument before the Eighth Circuit and summary judgment

1 briefing, counsel for Federal Defendants will require more time to prepare an adequate response  
2 to this motion.

3 3. Under the circumstances, the parties agree that the following is a reasonable  
4 briefing schedule on this motion:

5 May 2, 2005: Federal Defendants' opposition to Plaintiffs' Motion to Compel  
6 Completion of the Administrative Record due

7 May 2, 2005: Responses by Intervenor-Defendants to Plaintiffs' Motion to Compel  
8 Completion of the Administrative Record due

9 May 9, 2005: Plaintiffs' reply in support of Motion to Compel Completion of the  
10 Administrative Record due

11 4. To accommodate this briefing schedule, Plaintiffs and Federal Defendants also  
12 request a new notice date of May 13, 2005 for this motion.

13 5. This is the first extension of the briefing schedule for this motion.

14 6. Intervenor-Defendants do not oppose this extension of the briefing schedule.

15 For these reasons, Plaintiffs and Federal Defendants request that the Court extend the  
16 notice date on Plaintiffs' Motion to Compel Completion of the Administrative Record to May  
17 13, 2005 and enter the briefing schedule set forth above.

18 Dated: April 7, 2005

19 Respectfully submitted,

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21 Assistant Attorney General  
22 JEAN E. WILLIAMS, Section Chief  
23 SETH M. BARSKY, Assistant Chief

24 s/ James A. Maysonett  
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11  
12 Attorneys for Plaintiffs

9 **ORDER**

10 IT IS SO ORDERED.

11  
12 \_\_\_\_\_  
13 Date

12 \_\_\_\_\_  
13 JOHN C. COUGHENOUR  
14 United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Patti A. Goldman, counsel for Plaintiffs, J. Michael Klise and John James Leary, Jr., counsel for Intervenor-Defendants CropLife America, and Russell C. Brooks, counsel for Intervenor-Defendants Washington State Farm Bureau et al.

s/ James A. Maysonett  
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